

EXHIBIT 1

to Plaintiff's
Opposition

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DOCKET NO. 04 11572 JLT

SUSAN COONEY,)
Plaintiff)

v.)

SAYBROOK GRADUATE SCHOOL AND)
RESEARCH CENTER.)
Defendant)

AFFIDAVIT OF PAUL W. MORENBERG

I, Paul W. Morenberg, do hereby depose the following under oath:

1. I am counsel of record for the plaintiff, Susan Cooney. I am a licensed member of the Massachusetts bar, and admitted to practice before the District Court. My affidavit is intended to authenticate exhibits to Plaintiff's Opposition to Defendant's Motion for Summary Judgment. This affidavit is filed as **Exhibit 1** to the Opposition.

2. **Exhibit 2** is a true and accurate copy of relevant sections of Volume I of Susan Cooney's deposition.

3. **Exhibit 3** is a true and accurate copy of relevant sections of Volume II of Susan Cooney's deposition.

4. **Exhibit 4** is a true and accurate copy of relevant sections of Saybrook's 1996-1998 Catalogue.

5. **Exhibit 5** is a true and accurate copy of relevant sections of William K. Bruff, Ph.D's Deposition.

6. **Exhibit 6** is a true and accurate copy of a document that is described as “Information about the CDPP and NPAA.”

7. **Exhibit 7** is a true and accurate copy of documents that are described as “CDPP Memorandum and Conference Call Documents.”

8. **Exhibit 8** is a true and accurate copy of a document described as “Letter of Rudy Melone dated March 20, 1995.”

9. **Exhibit 9** is a true and accurate copy of relevant sections of Greening’s Memorandum re APA Accreditation

10. **Exhibit 10** is a true and accurate copy of relevant sections of the “Deposition of Karen Schwartz, Ph.D..”

11. **Exhibit 11** is a true and accurate copy of the documents described as “Letters of Melone to Board Dated February 13, 1996.”

12. **Exhibit 12** is a true and accurate copy of the documents described as “Letters of Lawrence Ryan, Ph.D. to Board Dated February 28 and May 8, 1997.”

13. **Exhibit 13** is a true and accurate copy of the document described as “Letter of Lawrence Ryan Dated January 16, 1996 with Note from Bush to Melone.”

14. **Exhibit 14** is a true and accurate copy of relevant sections of the Deposition of Jack Reho.

15. **Exhibit 15** is a true and accurate copy of relevant sections of the document described as “Maureen O'Hara's Answers to Interrogatories.”

16. **Exhibit 16** is a true and accurate copy of the document entitled “Wake Up Call for Humanistic Warriors,” Maureen O’Hara, AHP Perspective, Jan./Feb., 1995.

17. **Exhibit 17** is a true and accurate copy of the document described as “Letter of William Bruff, Ph.D. to the Board Dated November 30, 2000.”

18. **Exhibit 18** is a true and accurate copy of the document described as
“Letter of Dr. Vicki Lyall to Richard Francis.”

19. **Exhibit 19** is a true and accurate copy of relevant sections of the
Deposition of Alan Vaughan, Ph.D.

20. **Exhibit 20** is a true and accurate copy of the documents described as
“Saybrook Letters re APA and Residence Obstacles.”

21. **Exhibit 21** is a true and accurate copy of relevant sections of the
document described as “President’s Report of Dr. O’Hara to Saybrook’s Board.”

22. **Exhibit 22** is a true and accurate copy of the document described as
“Letter from Richard Monahan, Ph.D.”

Signed under the pains and penalties of perjury this 19th day of September, 2006.

/s/ Paul W. Morenberg

Paul W. Morenberg, BBO # 631101
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Dated: September 19, 2006